



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

IC
F. #2017R00906

271 Cadman Plaza East
Brooklyn, New York 11201

December 17, 2024

By ECF and Email

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Michael McMahon, et al.
Criminal Docket No. 21-265 (S-1) (PKC)

Dear Judge Chen:

The government respectfully submits this letter to request the Court to so-order the proposed sentencing submissions schedule with respect to the upcoming sentencing hearings for defendants Michael McMahon, Zhu Yong and Congying Zheng. The government has conferred with counsel for defendants Michael McMahon, Zhu Yong and Congying Zheng, and defense counsel consents to the submissions schedule as follows:

Congying Zheng

Sentencing Hearing scheduled for: January 22, 2025
Defense Sentencing Submission due on: January 8, 2025
Government Sentencing Submission due on: January 15, 2025

Zhu Yong

Sentencing Hearing scheduled for: January 15, 2025
Defense Sentencing Submission due on: January 6, 2025
Government Sentencing Submission due on: January 13, 2025

Michael McMahon

Sentencing Hearing scheduled for: March 3, 2025
Defense Sentencing Submission due on: February 18, 2025
Government Sentencing Submission due on: February 25, 2025

The parties have agreed to the submissions schedule set forth above, which largely provides for sentencing submissions to be due as to the Court in advance of the schedule stated in the Your Honor's Individual Practices and Rules, to allow the Court additional time to review

and consider the submissions. See Individual Practices and Rules 5.B (defense sentencing submissions due at least five business days before sentencing and government sentencing submissions due at least two business days before sentencing).

As such, the government respectfully requests that the parties' sentencing submissions be due to the Court pursuant to the proposed consent schedule set forth above.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/
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MATTHEW G. OLSEN
Assistant Attorney General
Department of Justice
National Security Division

By: /s/
Christine Bonomo
Trial Attorney

cc: Clerk of Court (PKC) (By ECF)
Counsel of Record (By ECF)

SO ORDERED.

THE HONORABLE PAMELA K. CHEN
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK